

Pomes, Michael

From: Robert Trump <rtrump@totalpetroleumservices.com>
Sent: Friday, January 20, 2017 11:29 AM
To: Drouare, Douglas; Sac & Fox Truck Stop
Cc: Pomes, Michael; robwandrew@mac-const.com; Chris Kinn; mwatson@terranext.net; Kelly Cratsenburg; William_Milliard@us.crawco.com; Kyle Minden
Subject: Special Waste - Petroleum Contaminated Media [WARNING: SPF validation failed]
Attachments: removed.txt

Categories: EZ Record - Shared, Record Saved - Shared

All,

I have spoken to Mr. Anthony Guy of KDHE this morning. The media in question is accepted for disposal at Rolling Meadows landfill.

The current schedule from Mr. Andrews, MAC, is to begin excavation and transport of contaminated media from the Sac N Fox truck stop Monday, January 23, 2017, 6 AM. A representative of Total Petroleum and Terranext will be on site to provide the manifest to transporters and provide on-site monitoring by photo ionization detector which will be used to determine whether soil is to remain on site or be transported for disposal.

To be clear, if PID readings are under 100 ppm, the soil stays on site. If it is over 100 ppm, it will be hauled to the landfill. Further contaminates which are determined to exist beyond the defined parameters within the area defined below will be evaluated. Further environmental remedial techniques will be proposed for acceptance with the intent to clean this site up to levels which are acceptable per state and federal environmental laws.

We believe that the level of contaminate immediately within the east bottom pit and continuing in an easterly direction is considered 'gross' contamination and should be removed from this site. The distances will be predetermined to stay within the boundaries of the existing product lines running east and then north to the south east edge of the building. We will maintain a sufficient distance of 18' from the south edge of the building so no structural damage may be incurred during excavation. A previous conversation with Mr. Andrews suggested this distance was appropriate by engineering standards to ensure no damage to the existing structure.

Further work according to the work plan with additional well installation and vapor intrusion testing will also be conducted during this week.

If there are any questions or comments, please feel free to reply.

Sincerely,

Robert L. Trump
Total Petroleum Services

Dear Mr. Drouare,

I have been reviewing the Federal Code of Regulations Exemptions under 40. 261.4 as it relates to the following:

(10) Petroleum-contaminated media and debris that fail the test for the Toxicity Characteristic of § 261.24 (Hazardous Waste Codes D018 through D043 only) and are subject to the corrective action regulations under part 280 of this chapter.

The chart used to determine whether contaminated media fails this test identifies a number of elements but the one which I have pertinent data on is Benzene which is listed as D018 with a regulatory threshold of .5 ppm.

My question: Am I correctly interpreting this chapter to mean that contaminated media and debris from this site that contains a level of Benzene, in excess of 0.5 ppm is considered "non-exempt" status for Petroleum-contaminated media and as such is considered a hazardous material based on that characteristic?

It appears to me that further reading states it is to be analyzed per the TCLP test method 1311. Now the analytical results which we have today are not per TCLP 1311 but per method 8260/OA1.

This brings me to my next question regarding the rule of 10. I'm familiar with this being used when a land fill determines whether to accept material based on the lead content. Does this rule apply to a toxic material such as benzene?

Can you provide your guidance regarding this particular site and whether or not I am using the correct data to make a determination to further excavate or leave and remediate in situ.

Thanks,
Robert

Hello Mr. Drouare,

Thank you for your input below.

Further analytical has just been received on the samples taken from the tank pit west, north, and east.

I agree with removal during repairs. However, you also made the comment removing grossly impacted source material is a good thing. I also agree with this statement. We provided Waste Management with the analytical and profile information based on drilling soil samples. That is what we were approved for hauling to the land fill.

However, the new analytical just in confirms the majority of contaminate is toward the east of the tank pit.



Table 2.0 Soil/Water Analytical Results Tank	
Excavation	Sac and
Fox Truck Stop	1346 US
75 Highway	Powhatten,
	Kansas

Date Sampled	Sample ID	Field Screening (ppm)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Zylene (mg/kg)	Total BTEX	Naphthalene (mg/kg)	MtB (mg/kg)
Tier 2 RSK, Soil Pathway - Non-Residential			28.2	29,800	145	1,410	-	64.7	1,050
Tier 2 RSK, Soil to Ground Water - Non-Residential			0.168	51.2	65.6	809	-	0.659	1.66
1/4/2017	Grvl SL Fill - 01	0.3	ND	ND	ND	ND	-	0.87	ND
1/4/2017	Grvl SL Fill - 02	59.5	0.0925	0.804	0.313	19	-	3.53	ND
1/10/2017	West Wall (Near West Dispenser)	95.7	0.163	1.58	2.97	27.6	-	4.8	ND
1/10/2017	North Wall (NE C of Excavation)	2,751	0.617	0.317	6.35	6.98	-	0.802	ND
1/10/2017	Bottom 1 (Center of Failed Tank)	36.7	0.408	ND	0.227	0.682	-	ND	ND
1/10/2017	Bottom 2 (East end of Failed Tank)	3,657	10.2	47.4	37	173	-	3.2	ND
11/11/2017	UST Pit Water	-	0.603	0.166	0.247	1.2	-	0.103	ND
Field screening samples analyzed in the field with a photoionization detector							ND - Non Detect		
TPH - Total Petroleum Hydrocarbons							NM - Not Measured		
LRH - Low Range Hydrocarbons							PNDG - Analytical Pending at Lab		
MRH - Medium Range Hydrocarbons							Values in Bold Exceed Tier 2 RSKs		
HRH - High Range Hydrocarbons							RSK - Risk-Based Standards for Kansas		
							Dated September 1, 2015		

The highlights in red depict those parameters which outside acceptable ranges for Tier 2 Risk Parameters.

Based solely on this analytical it would appear heavier contaminants are showing up in an easterly direction. That seems reasonable as that is the direction of ground water flow. The question then becomes whether these results would be considered gross contamination. In my opinion the results of Tier 2 Soil to Ground Water contamination would reflect gross contamination and would warrant excavation. However, I need to provide this new data to Waste Management to determine whether they may accept this at the land fill. I will submit this to them today.

We are researching some additional remedial methods which may be relevant to this site. There will be more to come shortly in that regard.

I will let everyone know asap whether Waste Management will accept this material as it is.

Should anyone have additional comments to add to the discussion then they are welcomed.

Sincerely,

Robert L. Trump
Total Petroleum Services

From: Drouare, Douglas [mailto:drouare.douglas@epa.gov]
Sent: Wednesday, January 18, 2017 11:51 AM

To: Robert Trump <rtrump@totalpetroleumservices.com>; Sac & Fox Truck Stop <sacfoxtsmgr@jbntelco.com>
Cc: Pomes, Michael <pomes.michael@epa.gov>
Subject: RE: Update at Sac and Fox Truck Stop [WARNING: SPF validation failed]

We have finished reading the update provided. For major releases, such as what occurred at the truck stop, it usually proves to be difficult to dig your way out of the problem. Excavation of contaminated soil and disposal of it or treatment of it is costly and disruptive to businesses where the work is being performed. If the material goes to the landfill you may be just transferring your liability to another site. In most instances responsible parties get what they can while they are performing repairs (removing grossly impacted source material is a good thing) and then rethink how they approach the rest of the contaminants. There are viable approaches to addressing the contaminants in place. Please keep us updated on the ongoing work.

Thanks,

Douglas E. Drouare, CPG
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From: Robert Trump [<mailto:rtrump@totalpetroleumservices.com>]
Sent: Wednesday, January 11, 2017 4:49 PM
To: Sac & Fox Truck Stop <sacfoxtsmgr@jbntelco.com>
Cc: robwandrew@mac-const.com; Kelly Cratsenburg <Kelly.Cratsenburg@anteagroup.com>; Kyle Minden <kminden@edtkc.com>; Meredith Watson <mwatson@terranext.net>; Chris Kinn <ckinn@terranext.net>; Drouare, Douglas <drouare.douglas@epa.gov>
Subject: Update at Sac and Fox Truck Stop [WARNING: SPF validation failed]

Attached is an update for Sac and Fox activities. If I have missed anyone in the send list, please forward to them or let me know and I will send another including their address.

Thanks and please comment.

Total Petroleum Services LLC

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